

Shana Lee McCart-Pollak  
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UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA

SHANA LEE MCCART-POLLAK,  
Plaintiff,

vs.

ON DEMAND DIRECT RESPONSE LLC,  
Delaware company, ON DEMAND DIRECT  
RESPONSE III LLC, Delaware company;  
BRETT SAEVITZON, individual; CRAIG  
SHANDLER, individual; JEFFREY MILLER,  
individual; DOES I-X; ROE BUSINESS  
ENTITTIES I-X;

Defendants

Case No: 2:20-cv-01624-GMN-VCF

~~PROPOSED~~ **PROPOSED STIPULATION  
DISCOVERY PLAN AND SCHEDULING  
ORDER**

Pursuant to Court Order (Dkt 212), comes now, Plaintiff Shana Lee McCart-Pollak ("Ms. McCart-Pollak") in proper person; Brett Saevitzon and Craig Shandler through their respective Counsel, David Dorenfeld. stipulate to the following proposed Discovery Plan and Scheduling Order

**MEMORANDUM OF POINTS AND AUTHORITIES**

On May 30, 2023 the Honorable Magistrate Judge Ferenbach ordered that the Parties had 30 days from the Defendants response to the Fifth Amended Complaint to file a Joint Discovery Plan and Scheduling Order. On Tuesday, August 8, 2023, Ms. McCart-Pollak and Mr. Dorenfeld held a zoom "meet and confer" and agreed to the

1 following dates, herein, in order to allow the Parties the opportunity to conduct full  
2 discovery.

### 3 **LEGAL STANDARD AND STATEMENTS**

4 Every motion or stipulation to extend or reopen discovery shall include:  
5

#### 6 **1) A Statement specifying the discovery completed;**

7 No Discovery has been completed.

8 a) **Saevitzon-** Has not served discovery on Ms. McCart-Pollak.

9 b) **Shandler-** Has not served discovery on Ms. McCart-Pollak.

10 c) **Ms. McCart-Pollak-** Ms. McCart-Pollak served Request for Production and  
11 Interrogatories on Saevitzon and Shandler, which are outstanding.  
12

#### 13 **2) A specific description of the discovery that remains to be completed**

14 Ms. McCart-Pollak plans on pursuing (Request for Admissions, Request for  
15 Production of Documents, Interrogatories, as well as Depositions) on all parties.  
16

#### 17 **3) The reason why the discovery remaining was not completed within the time** 18 **limits set by the discovery order.**

19 The Honorable Magistrate Judge Ferenbach, on May 30, 2023, put a stay of discovery,  
20 as well as, an order for the parties to meet and confer and to file a Discovery Plan and  
21 Scheduling Order to be filed within 30 days of the Defendants response to Plaintiff's Fifth  
22 Amended Complaint.  
23

#### 24 **4) A proposed schedule for completing all remaining discovery**

25 The Parties used a prior template (of dates and timeframes) of a Discovery  
26 schedule that was previously entered in this Case; and therefore, propose the following  
27 dates:  
28

**STIPULATED PROPOSED DISCOVERY PLAN AND SCHEDULING DEADLINES**

**Amended Pleadings:** Tuesday, **January 2, 2024**, (which is 90 days before the proposed Discovery cut-off date, due to the weekend)

**Discovery Deadline:** Monday, **April 1, 2024**

**Initial Expert Disclosures:** Thursday, **February 1, 2024**, (which is 60 days before the stipulated proposed Discovery cut-off date)

**Rebuttal Expert Disclosures:** Friday, **March 1, 2024** (which is 31 days before the stipulated proposed Discovery cut-off date)

**Dispositive Motions:** Wednesday, **May 1, 2024**, (which is 30 days after the stipulated proposed Discovery cut-off date)

**Proposed Pretrial Order:** Friday, **May 31, 2024**, (which is 30 days after the stipulated proposed Dispositive Motions cut-off date)

If dispositive motions are filed, the deadline for filing the joint pretrial order will be suspended until 30 days after decision on the dispositive motions or further court order.

**5) The Current trial date**

The extension of the discovery deadlines will have no bearing on trial, as no trial date has been set.

**Conclusion**

The Parties respectfully requests that the Court accepts this jointly stipulated proposed Discovery Plan and Scheduling Order.

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1 Dated this 11<sup>th</sup> day of August, 2023

  
SIGNATURE

Shana Lee McCart-Pollak  
1104 North Woodridge Lane  
Liberty, MO 64068  
Tel: (702) 439-2263  
Email: Lotsoflovebuddies@yahoo.com  
Pro Se

2  
3  
4  
5  
6  
7 Dated this 11 day of August, 2023

  
SIGNATURE

David K Dorenfeld  
(Cal. Bar No. 145056; Pro Hac Vici)  
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15 ~~[PROPOSED]~~ ORDER

16  
17 PURSUANT TO STIPULATION, IT IS ORDERED.

18  
19 Dated: 8-14-2023

  
HONORABLE CAM FERENBACH  
UNITED STATES MAGISTRATE JUDGE

**CERTIFICATE OF SERVICE**

I, Shana Lee McCart-Pollak, declares as follows, I am over the age of 18 years:

My address is: 1104 North Woodridge Lane  
Liberty, MO 64068  
(702) 439-2263

On August 11, 2023, I served the foregoing document(s) described as:

**PROPOSED STIPULATION DISCOVERY PLAN AND SCHEDULING ORDER**

I hereby certify that on the 11<sup>th</sup> day of August 2023, a true and complete copy of the foregoing was served on all counsel of record by mail to the addresses indicated below:

Dorenfeld Law  
30101 Agoura Court, Suite 210  
Agoura Hills, California 91301

I declare under penalty of perjury that the foregoing is true and correct.

  
Shana Lee McCart-Pollak